

1 MICHAEL D. HAIGHT, ESQ.
Nevada Bar No. 5654
2 ERIC J. WILLOUGHBY, ESQ.
Nevada Bar No. 10277
3 DONALD H. HAIGHT, ESQ.
Nevada Bar No. 1483
4 HENNESS & HAIGHT
8972 Spanish Ridge Avenue
5 Las Vegas, Nevada 89148
6 (702) 862-8200 Telephone
7 (702) 862-8204 Facsimile
ericw@hennessandhaight.com
8 *Attorneys for Plaintiff*

9
10 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

11 TANYA VESCO, individually
12
Plaintiff,

13 vs.

Case No. 2:13-cv-01490-JAD-CWH

14 STATE FARM MUTUAL AUTOMOBILE
15 INSURANCE COMPANY dba STATE
16 FARM, an entity licensed to do business in
Nevada; DOES I through X; and ROE
CORPORATIONS, XI through XX, inclusive,

17
18 Defendants.

19 **STIPULATED PROTECTIVE ORDER**
20 **REGARDING AARON KESLER'S MEDICAL RECORDS**

21 Pursuant to Fed. R. Civ. P. 26(c)(7), the parties hereby submit this proposed Stipulated
22 Order for the purpose of ensuring that matters raised by this proceeding are open to the public; yet,
23 at the same time, ensure that confidential medical information submitted by Aaron Kesler to
24 Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY (hereinafter
25 "STATE FARM") in connection with an automobile collision between Aaron Kesler (hereinafter
26 "Kesler"), and Plaintiff, Tanya Vesco (hereinafter "Vesco"), which occurred on February 25, 2011,
27 is not improperly disclosed. Accordingly, the parties, by their undersigned counsel, hereby
28

1 stipulate, subject to approval and entry of the corresponding Order by the Court, as follows:

- 2 1. State Farm shall stamp all Kesler Medical Records produced in accordance with the
3 Court's Order with the legend "CONFIDENTIAL SUBJECT TO PROTECTIVE
4 ORDER."
- 5 2. Vesco shall use Kesler's Medical Records only for the purposes of this action,
6 including any appeal of the Court's ruling, and shall not use Kesler's Medical Records
7 for any other purposes.
- 8 3. Any deposition testimony concerning Kesler's Medical Records shall be marked by the
9 court reporter as Confidential on the deposition transcript.
- 10 4. A copy of this Order shall be identified and marked as an exhibit to any such deposition
11 transcript, and all persons who have actual notice of this protective Order shall be
12 bound by its terms.
13
14

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

5. All persons governed by this Order, by reviewing Kesler's Medical Records, or seeking the protections of this Order for Kesler's Medical Records, shall agree to the jurisdiction of this Court over their person for the purpose of any action seeking to enforce the terms and conditions of this Order, or for any action for contempt for violation of the terms of this Order.

DATED this 14th day of July, 2014

DATED this 15th day of July, 2014

HALL, JAFFE & CLAYTON, LLP

HENNESS & HAIGHT, INJURY
ATTORNEYS

/s/ James E. Harper

/s/ Eric J. Willoughby for

Riley A Clayton, Esq.
Nevada Bar No. 5260
James E. Harper, Esq.
Nevada Bar No. 9822
7425 Peak Drive
Las Vegas, NV 89128
*Attorney for Defendant
State Farm Mutual Automobile
Insurance Company*

Michael D. Haight, Esq.
Nevada Bar No. 5654
8972 Spanish Ridge Avenue
Las Vegas, NV 89148
Attorneys for Plaintiff, Vesco

ORDER

It is so ORDERED.

DATED this 16th day of July, 2014.


UNITED STATES MAGISTRATE JUDGE